

Earl Gavin,)	
)	
Plaintiff,)	
v.)	
)	
Experian Information Solutions, Inc.; Trans)	Case No. 7:18-cv-00523-AMQ-JDA
Union LLC; Equifax Inc.,)	
)	
Defendants.)	
)	
)	

Pursuant to the Federal Rules of Civil Procedure and the Local Rules of this Court, Defendant Experian Information Solutions, Inc. (“Experian”), with the consent of *pro se* Plaintiff Earl Gavin and counsel for Defendants Trans Union LLC, Equifax Inc., and Equifax Information Services LLC, respectfully requests that this Court amend the existing Scheduling Order, filed on March 26, 2018 [Dkt. No. 24].

The parties desire to modify the current Scheduling Order by extending, for forty-five (45) days, the deadlines by which all parties are required to complete discovery and depositions, file dispositive motions, file motions in limine and pretrial disclosures, file pretrial briefs, and prepare for trial. The current discovery completion date is September 10, 2018. Plaintiff recently responded to written discovery propounded by Experian, which is now the subject of a motion to compel filed on August 20, 2018 [Dkt. No. 82]. The parties have scheduled and noticed Plaintiff's deposition for September 5, 2018; however, Plaintiff has until September 7,

2018, to respond to Experian's motion to compel. Experian also recently had a change of counsel, and new counsel required some time to become familiar with the relevant facts and issues, including pending motions and discovery. There have been no prior extensions of pretrial or trial deadlines in this action.

Accordingly, the parties respectfully request an additional forty-five (45) days to complete discovery and depositions and a corresponding extension of time for other deadlines affected thereby. The proposed deadline changes also will affect the current trial date (December 4, 2018). A copy of the proposed Consent Amended Scheduling Order is attached as **Exhibit A**.

Pro se Plaintiff and counsel for all Defendants have consented to these amendments.

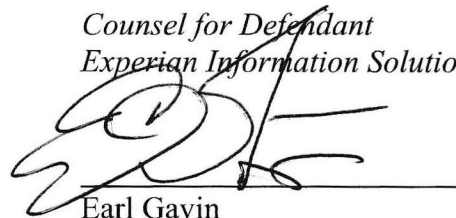
Dated: August __, 2018

Respectfully submitted,

/s/ Lyndey R. Z. Bryant

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*Counsel for Defendant
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A handwritten signature in black ink, appearing to read 'Earl Gavin', is written over a horizontal line.

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Services LLC*

CERTIFICATE OF SERVICE

A copy of the foregoing was filed on August 29, 2018, with the Court via the CM/ECF system, causing it to be served on all counsel of record. In addition, a copy of the foregoing was sent via mail and email to *pro se* Plaintiff at the physical address and email address listed below

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Pro Se Plaintiff

/s/ Lyndey R. Z. Bryant
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